EXHIBIT E34

Page 1 IN THE CIRCUIT COURT OF THE CITY OF ST. LOUIS STATE OF MISSOURI GAIL LUCILLE INGHAM and ROBERT INGHAM, et al., Plaintiffs,) Case Number: 1522-CC10417-01 v. JOHNSON & JOHNSON, et al., Defendants. FRIDAY, APRIL 13, 2018 Videotaped deposition of Alice M. Blount, Ph.D., held at the Best Western Hotel, 5 Best Western Place, Rutland, Vermont, commencing at 9:23 a.m., on the

Blount, Ph.D., held at the Best Western
Hotel, 5 Best Western Place, Rutland,
Vermont, commencing at 9:23 a.m., on the
above date, before Carrie A. Campbell,
Registered Diplomate Reporter, Certified
Realtime Reporter, Illinois, California &
Texas Certified Shorthand Reporter, Missouri
& Kansas Certified Court Reporter.

GOLKOW LITIGATION SERVICES 877.370.3377 ph | 917.591.5672 deps@golkow.com

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1	APPEARANCES:	raye 2		INDEY	raye	4
2			2	INDEX PAGE		
3	LANIER LAW FIRM, P.C.			APPEARANCES 2		
3	BY: W. MARK LANIER, ESQUIRE wml@lanierlawfirm.com		4	EXAMINATIONS		
4	6810 FM 1960 West		5	BY MR. LANIER 8		
5	Houston, Texas 772690-1448 (713) 659-5200		6	BY MR. DUBIN 43		
6			7	BY MR. PROST 80		
7	LANIER LAW FIRM, P.C. BY: RACHEL LANIER, ESQUIRE		8	BY MR. LANIER 86		
8	rachel.lanier@lanierlawfirm.com		9	BY MR. DUBIN		
9	126 East 56th Street, Sixth Floor New York, New York 10022		10	BY MR. LANIER		
	(212) 421-2800		12	BY MR. LANIER 107		
10	Counsel for Plaintiffs		13	DI MIC LE INIER.		
11 12			14	EXHIBITS		
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14	KEVIN M. HYNES, ESQUIRE		17	2 Blount optical microscope 17		
15	khynes@orrick.com 51 West 52nd Street		1.0	photograph		
	New York, New York 10019		18	2 Plount ontical microscope 17		
16	(212) 506-3742		19	3 Blount optical microscope 17		
17	Counsel for Defendant Johnson & Johnson		20	photograph 4 Photograph of Alice M. Blount 19		
18			20	microscope		
19	SANDBERG, PHOENIX & VON GONTARD, P.C.		21			
20	BY: MARK A. PROST, ESQUIRE			5 Blount optical microscope 20		
21	mprost@sandbergphoenix.com 600 Washington Avenue, 15th Floor		22	photograph		
21	St. Louis, Missouri 63101		23	6 Blount optical microscope 20		
22	(314) 446-4226			photograph		
23	Counsel for Imerys Talc America		24	7 OCHA D 1 : 11:1:15	26	
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1	BLITZ, BARDGETT, & DEUTSCH, L.C.		1	8 April 23, 1998 letter from Alice M. 35		
_	BY: GLENN A. NORTON, ESQUIRE		2	Blount to M. Raymond Hatcher, J&J-0049150		
2	gnorton@bbdlc.com 120 South Central Avenue, Suite 1500		3	9 "The Facts About Talc Safety" 40		
3	St. Louis, Missouri 63105		4	printout		
3	(314) 863-1500			10 Lanier's handwritten demonstrative 42		
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7	Jayne Conroy, Simmons Hanly Conroy Ella Fassler, Lanier Law Firm		8	Health"		
1	Jonathan Cooper, Tucker Ellis		9	12 "Amphibole Content of Cosmetic and 52 Pharmaceutical Talcs," AM Blount		
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14 15				letter from Ian M. Stewart to		
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25			25	(Exhibits attached to the deposition.)		

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ACKNOWLEDGMENT OF DEPONENT	1	CERTIFICATE108	1	Dubin. I represent Johnson & Johnson.
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5 JUDGE NORTON: I'm Glenn Norton. I'm the special makese cases. 8 JUDGORAPHER: All others will appear on the stenographic record. 10 The court reporter is Carrie Campbell, and she will now swear in the witness. 11 Campbell, and she will now swear in the witness. 12 12 13 13 14 14 15 15 16 16 17 17 16 17 17 16 17 17 18 18 19 19 19 19 19 19 19 19 19 19 19 19 19	3	ERRATA111	3	
Norton. I'm the special master appointed by the judge in these cases. Norton. I'm the special master appointed by the judge in these cases. VIDEOGRAPHER: All others will appear on the stenographic record. The court reporter is Carrie Campbell, and she will now swear in the witness. ALICE M. BLOUNT, Ph.D., of lawful age, having been first duly sworn to the witness. ALICE M. BLOUNT, Ph.D., of lawful age, having been first duly sworn to the witness. ALICE M. BLOUNT, Ph.D., of lawful age, having been first duly sworn to the witness. ALICE M. BLOUNT, Ph.D., of lawful age, having been first duly sworn to the witness. BLOWNING MENT AND ALICE M. BLOUNT, Ph.D., of lawful age, having been first duly sworn to behalf of the Plaintiffs, as follows: BLOWNING MENT AND ALICE M. BLOUNT, Ph.D., of lawful age, having been first duly sworn to behalf of the Plaintiffs, as follows: BLOWNING MENT AND ALICE M. BLOUNT, Ph.D., of lawful age, having been first duly sworn to behalf of the Plaintiffs, as follows: BLOWNING MENT AND ALICE M. BLOUNT, Ph.D., of lawful age, having been first duly sworn to behalf of the Plaintiffs, as follows: BLOWNING MENT AND ALICE M. BLOUNT, Ph.D., of lawful age, having been first duly sworn to behalf of the Plaintiffs, as follows: BLOWNING MENT AND ALICE M. BLOUNT, Ph.D., of lawful age, having been first duly sworn to behalf of the Plaintiffs, as follows: BLOWNING MENT AND ALICE M. BLOUNT, Ph.D., of lawful age, having been first duly sworn to behalf of the Plaintiffs, as follows: BLOWNING MENT AND ALICE M. BLOUNT, Ph.D., of lawful age, having been first duly sworn to behalf of the Plaintiffs, as follows: BLOWNING MENT AND ALICE M. BLOUNT, Ph.D., of lawful age, having been first duly sworn to the just of the witness. BLOWNING MENT AND ALICE M. BLOUNT, Ph.D., of lawful age, having been first duly sworn the witness. BLOWNING MENT AND ALICE M. BLOUNT, Ph.D., of lawful age, having been first duly sworn the witness. BLOWNING MENT AND ALICE M. A. A. Good morning. Q. The jury knows me by now. My n	4	LAWYER'S NOTES112	4	America, Inc.
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20 (Blount Exhibit 1 marked for identification.) 21 identification.) 22 identification.) 23 DIRECT EXAMINATION 24 QUESTIONS BY MR. LANIER: 25 Q. Good morning, Dr. Blount. Page 7 1 VIDEOGRAPHER: We are now on the record. 2 the record. 3 My name is Chris Coughlin, and 4 I'm a videographer for Golkow 5 Litigation Services. 6 Today's date is April 13, 2018, and the time is 9:23 a.m. 7 and the time is 9:23 a.m. 8 This video deposition is being held in Rutland, Vermont, in the matter of Gail Lucille Ingham and the matter of Gail Lucille Ingham and the Circuit Court of the City of St. Louis, State of the City of St. Louis, State of The Director of the City of St. Louis, State of The Director of the City of St. Louis, State of The Geponent is Alice Blount, The deponent is Alice Blount, The Alice Blount, T				behalf of the Plaintiffs, as follows:
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Missouri, Case Number 1522-CC10417-01. The deponent is Alice Blount, Ph.D. Will counsel please identify yourselves and state whom you Tepresent. MR. LANIER: My name is Mark Lanier, and I represent the ladies and families affected by the ovarian cancer in this trial. Missouri, Case Number 1522-CC10417-01. A. Okay. Q. I've written your name down on this sheet, and you can see down at the end, Dr. Alice Blount. Can you make sure I'm pronouncing it right. How do you say Blount? A. I say Blount, the same as you. Q. All right. Very good. A. I'm not a southerner. Q. You're not a southerner.				
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Lanier, and I represent the ladies and families affected by the ovarian cancer in this trial. 22 Q. All right. Very good. 23 A. I'm not a southerner. 24 Q. You're not a southerner.		-		
families affected by the ovarian 23 A. I'm not a southerner. 24 cancer in this trial. 24 Q. You're not a southerner.				
24 cancer in this trial. 24 Q. You're not a southerner.				
25 MR. DUBIN: My name is Morton 25 No, you're from Illinois?			25	

3 (Pages 6 to 9)

	Page 46		Page 48
1	tremolite and non-asbestos tremolite?	1	Q. 1996.
2	A. Yes, I would say so.	2	Okay. And then presumably you
3	They're because sometimes it's sort of	3	took some out of that bottle to do your
4	blocky and other times it is a definite	4	analysis of Sample I?
5	fiber. So you have you have to make a	5	A. Uh-huh.
6	decision when you see it.	6	Q. And the first analysis that you
7	And that's why I did that graph	7	have of Sample I I think we looked at this
8	he showed earlier. You can see which ones	8	document a little bit a second ago. Okay.
9	had an asbestiform form shape and which ones	9	So this was the letter that
10	don't. That's what you have to do to make	10	Mr. Lanier showed you to Mr. Hatcher
11	sure that you're getting one that's actually	11	A. Uh-huh.
12	asbestos or not.	12	Q and it attaches a paper,
13	Q. Right.	13	"The Detection and Quantification of Asbestos
14	And so, for example, there's	14	and Other Trace Minerals."
15	another term that's also used.	15	And that's from is that
16	A. Cleavage, yeah.	16	1990?
17	Q. Fragments, right?	17	A. I can't see it from here.
18	A. Yeah.	18	Q. There's a date on the bottom.
19	Q. Cleavage fragments, right?	19	MR. LANIER: I can't see it.
20	Is that a term that you're	20	QUESTIONS BY MR. DUBIN:
21	familiar with?	21	Q. Well, do you still have a copy
22	A. Yes.	22	of the document that
23	Q. And what is a cleavage	23	A. With everything
24	fragment?	24	MR. COOPER: It's in the bottom
25	A. That's the way the mineral will	25	right corner.
	Page 47		Page 49
1	actually break if you hammer it or something	1	THE WITNESS: 1990, yeah.
2	so that you can you know, you break it.	2	QUESTIONS BY MR. DUBIN:
3	It'll break along these cleavage lines, which	3	Q. And so we'll go into this a
4	is an inherent structure of the crystal to	4	little bit in depth, but why is it that you
5	start out with.	5	remember the timing of when you bought that
6	Q. And is it fair to say that a	6	Johnson & Johnson bottle?
7	cleavage fragment of tremolite is not	7	What brings to mind when you
8	asbestos?	8	did it?
9	A. I would say so, although there	9	A. Because we were about ready to
10	are others that do not some people don't	10	come up here and move we were about ready
11 12	say that. Some people count everything. Q. Right.	11 12	to move up here, and I remember I got it right before we moved up here.
13	Q. Right. A. But if there's a cleavage	13	Q. So when did you move up here?
14	fragment, I would not count it as asbestos.	14	A. 1996.
15	Q. Okay. And so if I understand	15	Q. Okay. And so one of the things
16	your testimony correctly, your sample that	16	about this paper and I'm sorry for people
17	Sample I that you mentioned, you're saying	17	I'm making seasick with the Elmo you have
18	that that was a bought from a bottle of	18	an analysis that we talked about a little bit
19	Johnson & Johnson's baby powder?	19	before of Sample I.
20	A. Yeah. Baby powder, yeah.	20	Do you see that?
21	Q. Okay. So when did you purchase	21	A. I, yeah.
22	that bottle?	22	Q. All right?
23	A. I think I purchased it right	23	A. Uh-huh.
24	before I left New Jersey, which would be	24	Q. And now that Sample I, did
25	<u>1996.</u>	25	you did you you've done other studies

	Page 106		Page 108
1	affirm that for decades, in the '80s and the	1	CERTIFICATE
2	'90s, at least, into the 2000s, Johnson &	2 3	I, CARRIE A. CAMPBELL, Registered
3	Johnson baby powder sold on the shelves had	_	Diplomate Reporter, Certified Realtime
4	asbestos and asbestiform in it?	4	Reporter and Certified Shorthand Reporter, do hereby certify that prior to the commencement
5	MR. DUBIN: Objection. Form.	5	of the examination, Alice M. Blount, Ph.D.,
6	THE WITNESS: Yes.	6	was duly sworn by me to testify to the truth, the whole truth and nothing but the truth.
7	MR. LANIER: Thank you. That's	7	I DO FURTHER CERTIFY that the foregoing is a verbatim transcript of the
8	all we've got.	8	testimony as taken stenographically by and
9	FURTHER RECROSS-EXAMINATION	9	before me at the time, place and on the date hereinbefore set forth, to the best of my
10	QUESTIONS BY MR. DUBIN:		ability.
11	Q. You were asked a very general	10	I DO FURTHER CERTIFY that I am
12	question by Mr. Lanier.	11	neither a relative nor employee nor attorney
13	Do you agree that the best way	12	nor counsel of any of the parties to this action, and that I am neither a relative nor
14	to determine whether or not there was	13	employee of such attorney or counsel, and that I am not financially interested in the
15			action.
16	asbestos in these products is to look at the actual testing results?	14 15	
17	-		CARRIE A CAMPRELL
18	•	17	CARRIE A. CAMPBELL, NCRA Registered Diplomate Reporter
19	Q. Right. And so other than whatever we	18	Certified Realtime Reporter California Certified Shorthand
20		19	Reporter #13921
	have in your papers that you brought here	20	Missouri Certified Court Reporter #859 Illinois Certified Shorthand Reporter
21 22	today, we have none of these test results		#084-004229
	that you're supposedly relying on for	21	Texas Certified Shorthand Reporter #9328 Kansas Certified Court Reporter #1715
23	opinions in the '70s, '80s, '90s about	22	Notary Public
24	Johnson & Johnson tale to look at today,	23 24	Dated: April 13, 2018
25	right?	25	
	Page 107		Page 109
1	A. Yes.	1	INSTRUCTIONS TO WITNESS
2	FURTHER REDIRECT EXAMINATION	2	
3	QUESTIONS BY MR. LANIER:	3	Please read your deposition over
4	Q. But you're the one who did the	4	carefully and make any necessary corrections.
5	work, aren't you?	5	You should state the reason in the
6	A. Yes.	6	appropriate space on the errata sheet for any
7	Q. So these are your test results	7	corrections that are made.
8	you're talking about. We don't need a sheet	8	After doing so, please sign the
9	of paper, do we?	9	errata sheet and date it. You are signing
10	A. We're using kind of concept	10	same subject to the changes you have noted on
11	method anyway.	11	the errata sheet, which will be attached to
12	MR. LANIER: Okay. Thank you.	12	your deposition.
13	MR. DUBIN: We can do this	13	It is imperative that you return
14	forever, I suppose. All right. Let's	14	the original errata sheet to the deposing
15	quit.	15	attorney within thirty (30) days of receipt
16	MR. LANIER: Thank you,	16	of the deposition transcript by you. If you
17	Dr. Blount.	17	fail to do so, the deposition transcript may
18	VIDEOGRAPHER: This concludes	18	be deemed to be accurate and may be used in
19	the April 13, 2018 deposition of	19	court.
20	Dr. Blount. Going off the record.	20	
21	The time is 11:25.	21	
22	(Deposition concluded at 11:25 a.m.)	22	
23	· · · · · · · · · · · · · · · · · · ·	23	
24		24	
25		25	

28 (Pages 106 to 109)

	Page 110			
1	ACKNOWLEDGMENT OF DEPONENT	1		
2	Mentiowellbowers of beroners			LAWYER'S NOTES
3 4	I,, do	2	DACE	LINE
5	hereby certify that I have read the foregoing pages and that the same is a correct	4	FAGE	Line
	transcription of the answers given by me to	5		
6	the questions therein propounded, except for the corrections or changes in form or	6 7		
7	substance, if any, noted in the attached	8		
8	Errata Sheet.	9		
9 10		10 11		
11		12		
12	Alice M. Blount, Ph.D. DATE	13 14		
13	Tillee M. Blouin, Th.B.	14 15		
14 15	Subscribed and sworn to before me this	16		
16	day of, 20 My commission expires:	17 18		
17 18	My commission expires:	19		
19 20	Notary Public	20		
21		21 22		
22		23		
24		24		
25		25		
1	 E R R A T A			
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29 (Pages 110 to 112)